

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V

CRIMINAL NO.04-cr-10048-NG-3

GIECLIFF RODRIGUEZ

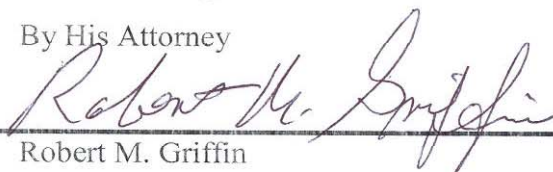
**DEFENDANT'S MOTION TO SEAL SENTENCING HEARING**

Now comes the defendant in the above referenced matter and respectfully moves this Court to seal the courtroom from the general public on November 16, 2006 at 3:15 p.m. As grounds therefore the defendant avers that he is scheduled to be sentenced at that time and he has provided the government with significant cooperation in its efforts to prosecute numerous members of the street gang known as the "Latin Kings". Further the defendant avers that his life and the lives of his girlfriend and his son have also been threatened by members of the Latin Kings. The Latin Kings are a nationwide street gang well known to law enforcement officials as a violent and fearless group. At sentencing it is expected that the degree of the defendant's cooperation will be a subject that will be discussed at length; for the purpose of the defendant's and his family members' safety this request is warranted and reasonable.

Respectfully Submitted

Giecliff Rodriguez

By His Attorney

A handwritten signature in cursive script, reading "Robert M. Griffin", is written over a solid horizontal line.

Robert M. Griffin

Denner ♦ Pellegrino Associates

4 Longfellow Place

Boston, Ma. 02114

617-227-2800

BBO # 553893